

## **REMARKS**

By this Amendment, Applicants cancel claim 13 without prejudice or disclaimer of the subject matter thereof, rewrite claim 14 in independent form, amend claim 16 to correct an informality, amend claims 15, 16, 23, and 24 to change claim dependencies, and amend claim 50 to more appropriately define the invention.

Additionally, Applicants amend Figs. 2 and 4-7 to add reference numeral 28 described in the specification, for example, at page 9. Applicants submit that no new matter is introduced by this amendment.

In the Office Action ("OA"), the Examiner allowed claims 1-12 and 26-49 and objected to claims 14 and 17-22 as being dependent upon a rejected base claim, but indicated that they would be allowable if rewritten in independent form including all the elements of the base claim and any intervening claims. Applicants thank the Examiner for indicating allowable subject matter in this application.

Applicants rewrite claim 14 in independent form including all the elements of claim 13. Accordingly, Applicants submit that claims 17-22 are allowable at least due to their dependence from allowable claim 14.

The Examiner also objected to claim 16 and rejected claims 13, 15, 23-25, 50, and 51 under 35 U.S.C. § 102(e) as anticipated by Yu, U.S. Patent No. 6,433,979 ("Yu"). Applicants address the objection and rejection below.

### **I. Response to Claim Objection**

The Examiner objected to claim 16 because of an informality. The Examiner alleged that an anode coupled to the second n-type portion was improper. Applicants amend claim 16 to change anode to cathode. Applicants submit that this amendment overcomes the informality. Accordingly, Applicants request that the Examiner withdraw the objection to claim 16.

## **II. Response to Rejection under 35 U.S.C. § 102(e)**

The Examiner alleged that claims 13, 15, 23-25, 50, and 51 are anticipated by Yu. Applicants cancel claim 13 without prejudice or disclaimer of the subject matter thereof. Accordingly, the rejection of claim 13 is rendered moot.

Furthermore, Applicants amend claims 15, 16, 23, and 24 to change these claims' dependencies. Claims 15, 16, 23, and 24 now depend from allowable claim 14 either directly or indirectly. Accordingly, claims 15 and 23-25 are allowable at least due to their dependence from allowable claim 14.

With regard to the rejection of claims 50 and 51, Applicants respectfully submit that Yu fails to anticipate these claims.

In order to properly anticipate Applicants' claimed invention under 35 U.S.C. § 102(e), each and every element of the claim in issue must be found, either expressly described or under principles of inherency, in a single prior art reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." M.P.E.P. § 2131 (8<sup>th</sup> Ed., Aug. 2001) (quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989)). Finally, "[t]he elements must be arranged as required by the claim." M.P.E.P. § 2131 at p. 2100-69.

Claims 50 is directed to a method for protecting an integrated circuit comprising a combination of elements including, *inter alia*, "providing a voltage coupling circuit coupled to ... gate terminals of ... first and second transistors [of a rectifier]."

Yu is directed to an electrostatic discharge device including a rectifier which comprises semiconductor regions and two MOS transistors 350 and 370. However, Yu does not disclose that the gate terminal of the transistors are coupled to a voltage coupling circuit. In fact, Yu discloses that the gate of transistors 350 and 370 are connected to a ground and low voltage

source Vdd , respectively. Hence, Yu does not disclose that the device includes a voltage coupling circuit.

Therefore, Yu fails to teach at least “providing a voltage coupling circuit coupled to ... gate terminals of ... first and second transistors [of a rectifier].” Thus, Yu does not anticipate claim 50. For at least this reason claim 50 is allowable.

Claim 51 is allowable at least due to its dependence from allowable claim 50.

### **III. Conclusion**

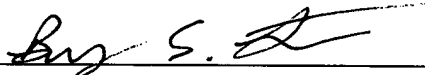
In view of the foregoing, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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Dated: October 27, 2003

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